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7 Attorney for Defendant
RAGINI VECHAM

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10 UNITED STATES DISTRICT COURT
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12 NORTHERN DISTRICT OF CALIFORNIA
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14 SAN JOSE DIVISION

15 UNITED STATES OF AMERICA,

16 CASE NO. CR-15-0427 BLF (HRL)

17 Plaintiff,

18 v.

19 RAGINI VECHAM,

20 Defendant.

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**AMENDED STIPULATION AND
[PROPOSED] ORDER MODIFYING
DEFENDANT RAGINI VECHAM'S
CONDITIONS OF RELEASE TO PERMIT
TRAVEL OUT OF DISTRICT FROM
JUNE 5 THROUGH JUNE 22, 2016, AND
JUNE 28 THROUGH JULY 15, 2016**

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28 **STIPULATION**

29 Defendant Ragini Vecham has been on pretrial release since her initial appearance before
30 the magistrate court in September 2015. It is a condition of her pretrial release that Ms. Vecham
31 not travel outside the Northern District of California without the permission of the Court.

32 Ms. Vecham wishes to travel with her children to visit family in Reno, Nevada from June
33 5, 2016 through June 22, 2016. She also wishes to travel with her children and other members of
34 her extended family (not including co-defendant Kishore Pallapothu) to New York, New Jersey,
35 Washington, D.C., and Vermont from June 28, 2016 through July 15, 2016.

36 The government does not object to the modification of Ms. Vecham's release conditions to
37 accommodate this travel. Pretrial Services likewise does not object, provided that Ms. Vecham

1 gives Pretrial Services all requested information concerning her travel and lodging plans in
2 advance of her departure.

3 Accordingly, the parties agree and stipulate that Ms. Vecham's conditions of release
4 should be modified to permit Ms. Vecham to travel to Reno, Nevada from June 5, 2016 through
5 June 22, 2016; and to New York, New Jersey, Washington, D.C., and Vermont from June 28,
6 2016 through July 15, 2016.

7 IT IS SO STIPULATED.

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9 DATED: May 26, 2016

JOSH COHEN
Attorney for RAGINI VECHAM

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11 DATED: May 26, 2016

TIMOTHY J. LUCEY
Assistant United States Attorney

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15 **ORDER**

16 By stipulation of the parties, and for good cause shown, it is hereby ordered that defendant
17 Ragini Vecham's conditions of release shall be modified as follows: Ms. Vecham shall be
18 permitted to travel from the Northern District of California to Reno, Nevada from June 5, 2016 to
19 June 22, 2016. Ms. Vecham shall also be permitted to travel from the Northern District of
20 California to New York, New Jersey, Washington, D.C., and Vermont from June 28, 2016 through
21 July 15, 2016. Ms. Vecham shall provide Pretrial Services with travel and lodging information as
22 directed by Pretrial Services. All other conditions of release shall remain in effect.

23 IT IS SO ORDERED.

24 DATED: _____

HOWARD R. LLOYD
UNITED STATES MAGISTRATE JUDGE

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